

**THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

A&B CAMPBELL FAMILY LLC, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:15-cv-00340-MEM
)	
CHESAPEAKE ENERGY)	
CORPORATION, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**STATUS REPORT FILED PURSUANT TO COURT’S JULY 17, 2023
ORDER BY DEFENDANT WILLIAMS PARTNERS, L.P. f/k/a ACCESS
MIDSTREAM PARTNERS, L.P. n/k/a THE WILLIAMS COMPANIES, INC.**

Defendant Williams Partners, L.P. f/k/a Access Midstream Partners, L.P. n/k/a The Williams Companies, Inc. (“Williams”) hereby provides the Court with the following status report pursuant to this Court’s July 17, 2023 Order (*Campbell*, ECF No. 170).

On June 8, 2023, the Fifth Circuit Court of Appeals reversed and vacated decisions of the district and bankruptcy courts approving two post-confirmation class action settlements in *Brown v. Access Midstream Partners, LP*, Civil Action No. 3:14-591 (M.D. Pa. 2014) and *Sussenbach v. Access Midstream Partners LP*, Civil Action No. 3:14-1197 (M.D. Pa. 2014). *See In re Chesapeake Energy Corp.*, 70 F.4th 273 (5th Cir. 2023). The Fifth Circuit held that on and after the Effective

Date of Chesapeake Energy Corporation's ("Chesapeake") bankruptcy Plan, pre-confirmation debts for deficient or improperly calculated royalties were "discharged" and "expunged." *See id.*

On July 27, 2023, Chesapeake filed a Motion for Entry of an Order (I) Enforcing the Confirmation Order and Plan Against the Reorganized Debtors; and (II) Declaring the MEC Settlement and Non-MEC Settlement Null and Void ("Bankruptcy Motion"). *In re Chesapeake Energy Corp.*, No. 20-33230 (Bankr. S.D. Tex.), ECF No. 322. In the Bankruptcy Motion, it is Chesapeake's position that legal claims seeking relief before the Effective Date of the Bankruptcy Plan [February 9, 2021] must be dismissed and that there are no legitimate claims for royalty underpayment after the Plan Effective Date because Chesapeake is paying royalty owners pursuant to royalty owner elections. As of the date hereof, the Bankruptcy Motion is pending and the time to file responses has not yet run.

The Bankruptcy Motion seeks an order requiring Plaintiffs to dismiss their pre-Effective Date alleged royalty claims with prejudice in light of the Fifth Circuit's ruling. Resolution of the Bankruptcy Motion will impact who the proper parties are in this case and whether Plaintiffs have any claims that have survived. It is appropriate to continue the stay in this matter until the Bankruptcy Motion is resolved. Therefore, Williams requests that the Court continue the stay of this matter

and direct the parties' to file another status report twenty-one (21) days after a ruling from the bankruptcy court on the Bankruptcy Motion.

Respectfully submitted,

Dated: August 7, 2023

By: /s/John S. Summers
Michael J. Gibbens, OBA #3339
(Admitted *Pro Hac Vice*)
CROWE & DUNLEVY, P.C.
222 N. Detroit Ave., Suite 600
Tulsa, OK 74120
(918) 592-9800
(918) 592-9801 (Facsimile)
kayci.hughes@crowedunlevy.com
mike.gibbens@crowedunlevy.com

-and-

John S. Summers, PA Bar ID #41854
HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
One Logan Square, 27th Floor
Philadelphia, PA 19310
(215) 496-7062
jsummers@hangleys.com

*Attorneys for Williams Partners LP f/k/a
Access Midstream Partners, L.P., n/k/a The
Williams Companies, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of August, 2023, that I caused the foregoing *Status Report Filed Pursuant to Court's July 17, 2023 Orders of Defendant Williams Partners, L.P. f/k/a Access Midstream Partners, L.P. n/k/a The Williams Companies, Inc.* to be filed electronically using the Court's electronic filing system, and that the filing is available to counsel for all parties for downloading and viewing from the electronic filing system.

/s/John S. Summers

John S. Summers